UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CRIMINAL NO. 07-10375-JLT

UNITED	STATES	OF	AMERICA	,
v.)
BARBARA DENENBURG)

MOTION TO DEEM RESTITUTION ORDER SATISFIED

Counsel for the Defendant, Barbara Denenburg, hereby moves this Honorable Court, to deem its restitution order satisfied by the defendant's payment of \$7,000.00. The defendant states the following grounds in support of this motion:

- 1. The defendant agreed to recommend a restitution order in the amount of \$67,000.00 in this case as part of her plea agreement with the government. The plea agreement was made with the understanding and agreement that this motion would be filed without objection by the government.
- 2. The defendant is indigent and disabled, such that she has neither the funds to pay the amount of the restitution order nor any reasonable likelihood of being in a position to do so in the future. She has borrowed funds from family and friend in order to make the \$7,000.00 payment.
- 3. This payment will provide Tele-Publishing, Inc. with more compensation that it would likely receive in the event that the defendant made payments under a payment plan.

Accound Adjam Adj

WHEREFORE, the undersigned counsel for the defendant respectfully requests this Honorable Court to deem its restitution order satisfied by the defendant's payment of \$7,000.00.

Respectfully submitted, BARBARA DENENBURG By her Attorney,

Leslie Feldman-Rumpler, Esq. BBO # 555792 101 Tremont Street, Ste. 708 Boston, MA 02108

(617) 728-9944